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8 UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 JOSEPH ANDREW HYLKEMA, a single
12 man,

13 Plaintiff,

14 v.

15 GC SERVICES LIMITED PARTNERSHIP
16 of Delaware; JANE DOE McKEE,
17 BARNDY DOE and DEREK HILL
jointly and severally,

18 Defendants.

Case No: 10-cv-1048

DEFENDANT GC SERVICES
LIMITED PARTNERSHIP OF
DELAWARE'S NOTICE OF
REMOVAL

19 TO THE CLERK OF THE ABOVE ENTITLED COURT:

20 PLEASE TAKE NOTICE that defendant GC SERVICES LIMITED
21 PARTNERSHIP of Delaware ("GC Services") hereby removes this action from the
22 District Court of Washington, Whatcom County (hereinafter "State Court Action"), to the
23 United States District Court for the Western District of Washington at Seattle, and in
24 support thereof states as follows:

25 1. GC Services is a party in a civil action brought against it in the District
26 Court of Washington, Whatcom County, entitled: *Joseph Andrew Hylkema, a single man*
27

1 *v. GC Services Limited Partnership of Delaware; Jane Doe McKee, Brandy Doe and*
2 *Derek Hill jointly and severally, Case No. CV-10-976.*

3 2. The District Court Case Summary located via the Washington Court
4 webpage states that the State Court Action was commenced on May 27, 2010, the date
5 the Complaint was filed in Whatcom County. GC Services was duly served with the
6 Complaint by process server on June 8, 2010. A true and accurate copy of the Complaint
7 is attached as Exhibit A. GC Services has not filed any documents in the State Court
8 Action.

9 3. This Notice of Removal is timely under 28 U.S.C. § 1446(b) because it is
10 timely filed within 30 days after service of process.

11 4. Federal subject matter jurisdiction exists in this case pursuant to 28 U.S.C.
12 § 1441(b), because this is a civil action which includes three claims arising under the
13 laws of the United States, namely 15 U.S.C. § 1692e (the Fair Debt Collection Practices
14 Act). *See* Complaint ¶¶ 5.1, 5.2, 5.3 & 5.4. *See also* 28 U.S.C. § 1367 (supplemental
15 jurisdiction); 28 U.S.C. § 1441(c) (when one claim is removable, court may remove
16 entire case); *Beneficial Nat'l Bank v. Anderson*, 539 U.S. 1, 6 & n.3 (2003). As such,
17 removal is appropriate without regard to the citizenship or residence of the parties.

18 5. GC Services seeks removal of this action to this Court and submits this
19 Notice along with the exhibits, in accordance with 28 U.S.C. § 1441 and 1446.

20 6. On information and belief, the remaining defendants (Jane Doe McKee,
21 Brandy Doe and Derek Hill) have not been served and no counsel has appeared on their
22 behalf in the State Court Action.

23 7. Written notice of the filing of this Notice of Removal will be given to the
24 plaintiff; a copy of this Notice of Removal and supporting papers will be filed with the
25 Clerk of the State Court, as provided by 28 U.S.C. § 1446(d).

1 8. This notice is signed pursuant to FRCP 11.

2 WHEREFORE, defendant GC SERVICES LIMITED PARTNERSHIP of
3 Delaware pray that the above described action pending against it in the State Court be
4 removed to this Court.

5 DATED this 24th day of June, 2010.

6
7 HINSHAW & CULBERTSON LLP

8
9 /s David J. Elkanich

10 David J. Elkanich, WSBA No. 35956

11 Of Attorneys for Defendant GC SERVICES
12 LIMITED PARTNERSHIP of Delaware

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2010, I caused the document **DEFENDANT GC SERVICES LIMITED PARTNERSHIP OF DELAWARE'S NOTICE OF REMOVAL** to be mailed by electronic mail and by first-class mail to the following:

Mr. Joseph Andrew Hylkema
477 Peace Portal Drive #107-244
Blaine, Washington 98230
Telephone: (206) 202-4530
Email: hylxemaj@isomedia.com

Plaintiff, *Pro Se*

I hereby certify that on June 24, 2010, I caused to be electronically filed with the clerk of the Court through the CM/EDF system, the document **DEFENDANT GC SERVICES LIMITED PARTNERSHIP OF DELAWARE'S NOTICE OF REMOVAL**, which will send notification of such filing(s) to the following:

[N/A]

DATED this 24th day of June, 2010.

HINSHAW & CULBERTSON LLP

/s David J. Elkanich

David J. Elkanich, WSBA No. 35956

Of Attorneys for Defendant GC SERVICES
LIMITED PARTNERSHIP of Delaware